DATE: January 22, 1999

TO: Office of Water Programs
Field Offices

FROM: Allen R. Hammer, PE, Director
Division of Water Supply Engineering

THROUGH: Eric H. Bartsch, PE, Director
Office of Water Programs

SUBJECT: Water – Procedure – Surveillance – Lead and Copper Rule – Operational Control Monitoring

Proposed EPA changes to the Lead and Copper Rule will require waterworks to continuously operate installed optimum corrosion control treatment and mandate that states ensure that this requirement is met. Further, the *Waterworks Regulations* 12 VAC 5-590-480 and Appendix G contain requirements and guidance for analytical laboratory control at waterworks utilizing various treatment processes.

This memo is intended to provide staff guidance in requiring those waterworks providing corrosion control treatment to conduct operational control monitoring:

1. All waterworks providing corrosion control treatment shall conduct operational control monitoring to ensure that the treatment is continuously operated and is operated in an appropriate manner.

2. The District Engineer is responsible to determine the system specific water quality parameters to be monitored based upon the type of corrosion control treatment. Typical corrosion control treatment water quality parameters would include pH, orthophosphate, alkalinity, etc.

3. The District Engineer is responsible for establishing the frequency of monitoring corrosion control water quality parameters. Large waterworks or those with complex treatment must monitor daily. Less frequent monitoring may be allowed for smaller waterworks. All waterworks must monitor at least twice per week.

4. Analyses of corrosion control water supply parameters must conform with the most recent edition of *Standard Methods for the Examination of Water and Wastewater* and /

or the table of Analytical Methods contained in the Lead and Copper Rule (Federal Register, Vol. 56, No. 110, Friday June 7, 1991, page 26560). Exceptions to these analytical methods can be granted to small waterworks. Granted exceptions will allow measurement of pH by use of the HACH Pocket Pals or other means and orthophosphate by use of color comparator kits.

5. The results of corrosion control treatment operational control monitoring must be reported to the respective OWP Field Office no later than the 10th day of the month following the month in which the monitoring was conducted.

All waterworks providing corrosion control treatment and currently not conducting operational control monitoring must be notified in writing of these monitoring and reporting requirements. In addition, OWP staff should provide assistance as needed to the owners of small waterworks in selecting and obtaining the necessary testing equipment.

The notifications to the affected waterworks must be completed by March 31, 1999. If there are any questions, please contact Jim Moore.